

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

VICTOR MANUEL PIMENTEL MORENO

DEBTOR

CASE NO 16-00584-EAG

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN  
AND CERTIFICATE OF SERVICE**

**TO THE HONORABLE COURT:**

**NOW COMES, VICTOR MANUEL PIMENTEL MORENO**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays:

1 The debtor is hereby submitting a proposed amended Plan, dated April 1, 2016, herewith and attached to this motion.

2. This proposed amended Plan is filed to correct the step-up amount in Payment Plan Schedule.

**WHEREFORE** debtor respectfully requests the confirmation of the proposed amended Plan, dated April 1, 2016.

**I CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor, Victor Manuel Pimentel Moreno, and to all creditors and interested parties appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 1<sup>st</sup> day of April, 2016.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
TEL. NO. (787) 744-7699  
EMAIL: rfigueroa@rfcprlaw.com

United States Bankruptcy Court  
District of Puerto Rico, San Juan Division

IN RE:

Case No. **2:16-bk-584**

**PIMENTEL MORENO, VICTOR MANUEL**

Chapter **13**

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <b>4/01/2016</b> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>  \$ <u>130.00</u> x <u>44</u> = \$ <u>5,720.00</u> \$ <u>415.00</u> x <u>16</u> = \$ <u>6,640.00</u> \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____  <p style="text-align: right;">TOTAL: \$ <b>12,360.00</b></p> Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows: _____  <input type="checkbox"/> Other: _____  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____		<b>II. DISBURSEMENT SCHEDULE</b>  A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <u>Anderson Financial</u> Cr. _____ Cr. _____ # <u>57114767</u> # _____ # _____ \$ <u>352.22</u> \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>Sistema de Retiro El Sistema de Retiro El</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.  OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) <b>"Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."</b>	
<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <b>2,868.00</b>			
Signed: <u>Victor M. Pimentel Moreno</u> Debtor   Joint Debtor			

Attorney for Debtor **RFigueroa Carrasquillo Law Office PSC**

Phone: **(787) 744-7699**

Label Matrix for local noticing  
0104-2  
Case 16-00584-EAG13  
District of Puerto Rico  
Ponce  
Fri Apr 1 12:06:55 AST 2016

MONEY EXPRESS  
PO BOX 9146  
SAN JUAN, PR 00908-0146

ORIENTAL BANK-CCU  
CCU - BANKRUPTCY DEPARTMENT  
PO BOX 364745  
SAN JUAN, PR 00936-4745

US Bankruptcy Court District of PR  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

Anderson Financial Services of PR  
DBA Borinquen Title Loans  
3440 Preston Ridge Rd Ste 500  
Alpharetta, GA 30005-3823

Department of Treasury  
Bankruptcy Section  
PO Box 9024140  
San Juan, PR 00902-4140

Firstbank Puerto Rico  
PO Box 9146  
San Juan, PR 00908-0146

Island Finance  
PO Box 71504  
San Juan, PR 00936-8604

MONEY EXPRESS  
CONSUMER SERVICE CENTER  
BANKRUPTCY DIVISION (CODE 248)  
PO BOX 9146 SAN JUAN PR 00908-0146

Money Express  
Bankruptcy Division  
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San Juan, PR 00908-0146

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PO BOX 195369  
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SALINAS, PR 00751-2075

End of Label Matrix  
Mailable recipients 17  
Bypassed recipients 0  
Total 17